



September 11, 2006

**VIA OVERNIGHT DELIVERY**

Thomas W. Easterly, P.E., DEE, QEP  
Commissioner  
Indiana Department of Environmental Management  
100 North Senate Avenue  
IGCN 1301  
Indianapolis, IN 46206

Bharat Mathur  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: City of Indianapolis -- CSO Long-Term Control Plan

Dear Commissioner Easterly and Regional Administrator Mathur:

I am pleased to submit for approval the City of Indianapolis' revised Raw Sewage Overflow Long-Term Control Plan and Water Quality Improvement Report (LTCP). The city first submitted its plan on April 1, 2001, and since that time has been working to address comments from both IDEM and U.S. EPA. Although the review and revision process has taken longer than any of us anticipated, we believe that the time spent with both the regulatory agencies and the public has resulted in the best plan for the City of Indianapolis.

Throughout that time, the city has made steady progress in improving water quality, investing more than \$200 million in early action projects. As an example, our new flow equalization basins at the Belmont and Southport AWT plants have prevented more than 550 million gallons of sewage from overflowing into the White River this year alone. Other improvements to our sewage collection system are reducing overflows by more than 145 million gallons in a typical year. Overflows will be reduced even more as the long-term control plan is implemented.

Department of Public Works

2460 City County Building  
200 East Washington Street  
Indianapolis, Indiana 46204

(317) 327-4000  
(fax) 327-4954  
(TDD) 327-5186  
indygov.org



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Please note that Section 9 of the LTCP is a use attainability analysis (UAA). Through the UAA, we are formally requesting a refinement to the designated recreational use through the establishment of a wet weather limited use subcategory for CSO-impacted waterways, consistent with the level of control that will be achieved after LTCP implementation. We look forward to working with both IDEM and U.S. EPA during the UAA review and approval process.

If you or your staff have any questions, please do not hesitate to contact me.

Sincerely,

Kumar Menon, Director  
Department of Public Works

Enclosure

cc: (Via electronic mail)  
Bruno Pigot, Assistant Commissioner, IDEM Office of Water Quality  
Beth Admire, IDEM Office of legal Counsel  
Jo Lynn Traub, Director, U.S. EPA Region 5 Division of Water  
Gary Prichard/Susan Perdomo, U.S. EPA Region 5 Office of Regional Counsel  
Alan Morrissey, U.S. EPA OECA  
Greg Sukys, Department of Justice  
James A. Garrard, City of Indianapolis  
Kobi M. Wright, Corporation Counsel, City of Indianapolis  
Rosemary G. Spalding  
Paul Calamita